

RECORD NO. 15-1482

**IN THE
UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

GERARD OUSLEY,

Plaintiff-Appellant,

v.

ROBERT McDONALD,
Secretary of the Department of Veterans Affairs,

Defendant-Appellee.

**PLAINTIFF-APPELLANT'S MOTION FOR EXTENSION OF TIME
TO FILE JOINT APPENDIX AND OPENING BRIEF**

NOW COMES Plaintiff-Appellant, by and through the undersigned counsel and pursuant to Rule 27 of the Federal Rules of Appellate Procedure, and moves this honorable court for an extension of time of Thirty (30) days to file the Joint Appendix and Opening Brief in this matter. In support of this motion, Plaintiff-Appellant shows unto the court the following:

1. That the Joint Appendix and Opening Brief are due today and the time has not yet expired.

2. That counsel for the Plaintiff-Appellant has conferred with counsel for

Defendant-Appellee and she consents to the relief requested.

3. Due to two (2) separate and distinct personal issues that have adversely affected his preparation time and more fully set forth below, Plaintiff-Appellant's counsel is desirous of an extension of thirty (30) days to complete the Opening Brief:

a. On Sunday, October 4, 2015, one of Plaintiff-Appellant's counsel's close friend/law school classmate's wife passed away, Sheri Hall Gilbert. Her funeral is October 17, 2015. Counsel was best man at their wedding.

b. Plaintiff-Appellant's counsel's father-in-law is gravely ill and has taken a turn for the worse after a recent fall in the home. He has refused further medical intervention understanding the consequences of his decision and the family has been called to see him immediately as his health deteriorates daily and he is not expected to recover, even with medical attention. He is Seventy-Five (75) years of age.

4. That this motion is interposed in good faith and not for purposes of delay.

WHEREFORE, Plaintiff-Appellant respectfully requests an extension of time of Thirty (30) days to file and serve his Opening Brief and Joint Appendix up to and including the 12th day of November, 2015.

This the 13th day of October, 2015.

HAIRSTON LANE, PA

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CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2015, I electronically filed the foregoing Motion for Extension of Time with the Clerk of Court by using the CM/ECF system, which will send notification of such filing to the following:

Sharon C. Wilson, Esq.
U.S. Attorney's Office
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